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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

DEC 15 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

Petition for Rulemaking of the )  
Ad Hoc Alliance for Public Access to 911 )

CC Docket No. 94-102

To: The Commission

DOCKET FILE COPY ORIGINAL

**COMMENTS OF THE RURAL CELLULAR ASSOCIATION**

The Rural Cellular Association ("RCA") submits the following Comments in response to the above-captioned Petition for Rulemaking ("Petition")<sup>1</sup>, Public Notice of which was released by the Commission on November 13, 1995. As an active participant in CC Docket No. 94-102,<sup>2</sup> RCA is on record as supporting the basic philosophy that access to emergency services should be available to consumers of mobile telecommunications services.<sup>3</sup> RCA member companies, without government mandate, historically have provided and continue to provide access to 911 service free of charge to valid cellular service subscribers.<sup>4</sup> RCA submits, however, that the proposal by the Ad Hoc Alliance (the "Alliance") to "require that the public be afforded extensive and unrestricted access, for

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<sup>1/</sup> Petition For Rulemaking of the Ad Hoc Alliance For Public Access to 911 ("Petition"), filed October 27, 1995.

<sup>2/</sup> In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket 94-102, Notice of Proposed Rulemaking, 9 FCC Rcd 6170 (1994) ("NPRM").

<sup>3/</sup> See Comments of the Rural Cellular Association in CC Docket 94-102, filed January 9, 1995; Reply Comments of the Rural Cellular Association, filed March 17, 1995.

<sup>4/</sup> RCA is unaware of any member company which does not provide access to 911 emergency services free of charge.

the purpose of placing emergency 911 telephone calls, to the nation's cellular telephone systems"<sup>5</sup> is overly broad and could ultimately be detrimental to the interests of mobile telecommunications services consumers. RCA suggests that the public interest will better be served by a requirement that cellular carriers promptly connect all 911 calls initiated by consumers with a valid subscription to service. This more tailored 911 connection requirement is the appropriate federal regulatory response to serve the important goal of providing emergency services to consumers of mobile telecommunications. In support thereof, RCA shows the following:

#### **I. STATEMENT OF INTEREST**

RCA is an association comprised of telecommunications companies providing cellular service to rural America. RCA's members operate more than eighty licensed cellular service areas across the country, making service available to more than 6.5 million people. Through these communications facilities, RCA member companies provide cellular service to small Metropolitan Statistical Areas ("MSAs") and Rural Service Areas ("RSAs"). As providers of mobile radio services connected to the public switched network, RCA member companies will, therefore, be subject to rules adopted in this proceeding. Consequently, RCA member companies are parties in interest.

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<sup>5</sup>/ Petition at p. 2.

## II. DISCUSSION

### A. Prompt And Effective 911 Service Should Be Available To All Cellular Service Subscribers.

The Alliance proposes to amend the Commission's Rules to require cellular carriers to connect all 911 calls "without precondition."<sup>6</sup> The Alliance suggests this rule change is necessary to "fix today's 911 cellular access problems and tomorrow's PCS products while carriers design their networks of the future."<sup>7</sup> This sweeping generalization ignores the fact that both the provision of and the subscription to cellular services involve economic choices.

While well-intentioned, the Alliance's proposal is too broad to constitute an effective federal regulatory policy. In fact, the Alliance's proposal reaches well beyond mobile service subscribers to encompass all persons who choose to purchase cellular phones but do not subscribe to service. Just as landline handsets require connectivity to the landline system before a landline carrier assumes any obligation as a service provider, the scope of responsibility of cellular and other mobile service providers should be limited to their subscribers. Consequently, the appropriate expression of federal policy in this matter should be confined to the requirement that all mobile service providers promptly and efficiently process all 911 calls placed on validated and current cellular phones. It is both unreasonable and unsound

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<sup>6</sup>/ Petition at p. 3.

<sup>7</sup>/ Petition at p. 2.

to hold cellular carriers to a higher standard than their landline counterparts -- i.e., to require cellular carriers to provide open access to the cellular network to all people regardless of whether or not a person is a subscriber to cellular services.

RCA member companies provide 911 services not only because of members' strong sense of civic responsibility, but also in direct response to competitive market forces. The costs associated with the provision of access to mobile 911 to its subscribers are absorbed by the carrier or built into the overall rate structure. The Alliance alleges, without any offer of proof, that the associated costs of its proposals are minimal.<sup>8</sup> In fact, the implementation of the Alliance's proposals will result in increased costs. In addition, revenues can be expected to decrease, as customers who subscribe to cellular service mainly for its availability in emergency situations are encouraged to take a "something for nothing" route. The end result is that either the cellular service provider or remaining cellular subscribers will bear the economic burden.<sup>9</sup>

The Alliance also takes the simplistic view that the proposed rule changes would not prevent a carrier from billing for 911 calls.<sup>10</sup> It is clear, however, that implementation of per-call

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<sup>8</sup>/ Petition at p. 7.

<sup>9</sup>/ In many jurisdictions, states are acting to enable the assessment of 911 surcharges on each active subscription cellular phone. It is clear that active subscribers would, therefore, be subsidizing the occasional use of 911 services by non-subscribing cellular users.

<sup>10</sup>/ Petition at p. 6.

billing is impracticable, if not impossible. It is likely that the administrative costs involved in collecting a per-call service fee from those consumers who use a cellular telephone but are not valid subscribers to the cellular system would far exceed any collectible fee.

Inasmuch as RCA members and other cellular carriers establish rates based upon costs incurred, RCA submits that the proposed rule changes ultimately would result in consumers bearing the costs of the Alliance's proposals.<sup>11</sup> If adopted, the Alliance's proposals would result in costs caused by non-subscribers. This result is contrary to the policy position established by the Commission that the costs of telecommunications services should be borne by the cost-causer.<sup>12</sup>

**B. Wireline And Non-Wireline Cellular Licensees Should Not Be Required To Bear The Burden Of Public Safety Assistance Due To The Poor Signal Quality Of Their Competitors.**

At the outset, RCA reiterates its position that a policy mandating unrestricted access to the nation's cellular systems by

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<sup>11/</sup> Should the Commission nonetheless propose to mandate the provision of 911 mobile service without regard to subscription or non-subscription status, RCA respectfully submits that the Commission must also consider an appropriate cost recovery mechanism for mobile service providers. In this regard, RCA notes that, for several years, 911 service provision has been compensable to telephone companies not only by subscribers, but also by 911 service agencies. The Commission is already familiar with the establishment of funding mechanisms for specialized public service programs, such as that implemented to fund the provision of the Telecommunications Relay Service. See Third Report and Order, 8 FCC Rcd 5300 (1993).

<sup>12/</sup> See Phase I Third Report and Order in CC Docket 78-72, 93 FCC 2d 241 at ¶ 121 (1982); see also First Report and Order in CC Docket 79-105, 85 FCC 2d 818 (1981); see also Phase II Final Decision and Order 19129, 64 FCC 2d 1 (1977).

non-subscribers is inappropriate and uneconomic. The Alliance, however, also proposes to require that all newly constructed mobile stations be equipped to scan all of the control cellular telephone channels assigned to both System A and to System B and select and use the channel with the strongest signal whenever a 911 call is placed.<sup>13</sup> Basing its proposal on the suggestion that there is a significant variation of signal strength from the two cellular systems throughout the same service area, the Alliance proposes unrestricted access to the strongest signal available in any situation.<sup>14</sup> The Alliance states that this 'scanning' feature "will create a boom with increased sales for the manufacturers of cellular phones."<sup>15</sup> This proposal, like the proposal to connect all 911 calls without precondition, is not a simple, low-cost solution, as suggested by the Alliance. Both proposals would create a number of problems (e.g., collections) for mobile service providers and are, therefore, potentially detrimental to telecommunications consumers.

The Alliance asserts that since all cellular telephones are manufactured with all dedicated control and operating channels it will take only a small software change to comply with this proposed rule change.<sup>16</sup> While this proposal may be feasible, from a manufacturing perspective, such a requirement would force the

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<sup>13</sup>/ Petition at p. 3.

<sup>14</sup>/ Petition at pp. 4-5.

<sup>15</sup>/ Petition at p. 7.

<sup>16</sup>/ Id.

cellular carrier with the stronger signal in a particular area to handle all 911 calls. Currently, both cellular carriers have the incentive to compete with each other in constructing and operating their systems in such a way as to achieve the highest quality signal. If all emergency calls were automatically routed to the system operator with the strongest and most reliable signal, this system operator would bear all of the administrative and economic burden of assisting in the provision of public safety.

It is completely inequitable to reward the provider of the best quality service with increased economic and administrative burdens. Accordingly, there should be no federal mandate to require the mobile system operator with a higher quality signal to bear a disproportionate share of these costs.

### **III. CONCLUSION**

RCA respectfully submits that access to 911 service is widely available through the cellular network to those with initialized handsets and a current subscription for cellular service. While concurring with the Alliance's general concern regarding public safety, RCA submits that imposition of a requirement to connect all 911 calls without precondition would be an overly broad and inappropriate federal regulatory response to the issue of public safety. In addition, RCA submits that there should be no federal mandate requiring cellular system operators with a higher quality signal to bear a disproportionate share of assisting in protecting public safety.

RCA therefore respectfully submits that the most effective and appropriate method of ensuring public safety will be found in a tailored requirement for carriers to connect 911 calls placed by subscribers to their cellular systems promptly and effectively.

Respectfully submitted,

RURAL CELLULAR ASSOCIATION

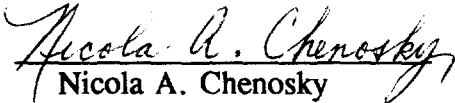
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December 15, 1995

**CERTIFICATE OF SERVICE**

I, Nicola A. Chenosky, hereby certify that a copy of the foregoing Comments of the Rural Cellular Association was served on this 15th day of December 1995, by first class, U.S. mail, postage prepaid, to the parties on the attached pages.

  
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